

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 22-180 (JNE/TNL)

The United States of America by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Assistant United States Attorney Thomas Calhoun-Lopez, hereby makes the following Motions in Limine regarding the above-titled matter.

1. The United States moves for a pretrial ruling allowing the United States to elicit the fact that officers found Hitchcock's firearm in the course of arresting him after Minneapolis Police Sergeant Andrew Schroeder witnessed a hand-to-hand marijuana sale by Hitchcock. This evidence is necessary to provide the context of the subsequent arrests. The evidence is also separately admissible to show Hitchcock's motive for possessing a firearm. The admissibility of this evidence is discussed in the Government's Trial Brief, ECF 67, at § IV.a.

2. The United States respectfully requests that the Court allow the United States to impeach the Defendant with his prior felony convictions within the last ten years for the limited purpose of impeaching his credibility pursuant to Fed. R. Evid. 609(a)(1)(B) if he elects to testify. The inadmissibility of this impeachment is discussed in the Government's Trial Brief, ECF 67, at § IV.e

3. The United States moves to preclude the Defendant or his counsel, in the presence of the jury, from mentioning or referring to the potential punishment the Defendant may face if convicted.

4. The United States moves to preclude the Defendant or his counsel, in the presence of the jury, from offering or referring in any way to hearsay statements of the Defendant.

Dated: March 29, 2023

Respectfully Submitted,

ANDREW M. LUGER  
United States Attorney

*s/ Thomas Calhoun-Lopez*  
BY: THOMAS CALHOUN-LOPEZ  
Assistant U.S. Attorney